

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Appellant:	Vijay V. SARASHETTI	§	Confirmation No.:	1087
		§		
Serial No.:	10/662,964	§	Group Art Unit:	2156
		§		
Filed:	09/12/2003	§	Examiner:	Truong V. Vo
		§		
For:	Representing Records	§	Docket No.:	200600636-1

REPLY BRIEF

Mail Stop Appeal Brief – Patents

Date: October 18, 2010

Commissioner for Patents
PO Box 1450
Alexandria, VA 22313-1450

Sir:

In the Examiner's Answer dated August 17, 2010, the Examiner maintained the previous rejections. Appellant respectfully disagrees with the Examiner's interpretation of the cited art and the claimed limitations, and thus with the rejections.

At issue is whether claims 1, 9, 17, 21 and 24 are obvious under 35 U.S.C. § 103 over *Ang* in view of *Gibson*. The text of independent claims 1, 9, 17, 21 and 24 is provided herein for convenience (emphasis added).

1. A computer implemented method for representing records, the method comprising:

receiving an order for a transaction at a record collection site;
producing a record that represents the transaction ***at the record collection site;***

storing the record in a memory location in a computer readable storage medium ***at the record collection site;***

assigning a unique identifier to the record stored ***at the record collection site;***

entering the unique identifier in a hierarchical tree structure stored in a computer readable storage medium ***at the record collection site***, wherein the unique identifier comprises information for accessing the record in the memory location, and wherein the tree structure comprises a plurality of branches connected by nodes; and

sending the hierarchical tree structure to a central storage site that is separate from the record collection site; and

receiving requests from the central storage cite to access records at the record collection site in accordance with the hierarchical tree structure sent to the central storage site.

9. A computer program product, recorded in a computer-readable storage medium comprising logic instructions which, when executed on a processor, cause the processor to:

collect orders for a plurality of transactions at a record collection site;

produce a record for each of the transactions at the record collection site;

store the records in a memory location at the record collection site;

assign a unique identifier to each of said records stored at the record collection site;

enter the unique identifiers in a hierarchical tree structure stored at the record collection site, wherein each unique identifier comprises information for accessing a corresponding record in the memory location, and wherein the tree structure comprises a plurality of branches connected by nodes; and

send an aggregate report of record type counts at the record collection site based on the unique identifiers in the hierarchical tree structure, the aggregate report being sent to a central storage site that is separate from the record collection site.

17. A computer implemented method for representing records, the method comprising:

receiving an order for a transaction at a record collection site;

producing a record that represents the transaction at the record collection site;

storing the record in a computer readable storage medium in a memory location at the record collection site;

assigning a unique identifier to the record stored at the record collection site;

entering the unique identifier in a hierarchical tree structure stored in a computer readable storage medium at the record collection site, wherein the unique identifier comprises information for accessing the record in the memory location, and wherein the tree structure comprises a plurality of branches connected by nodes;

sending the hierarchical tree structure to a central storage site that is separate from the record collection site;

receiving requests from the central storage cite to access records at the record collection site in accordance with the hierarchical tree structure sent to the central storage site; and

using the unique identifier to access the record stored at the record collection site.

21. A computer implemented method for representing records, the method comprising:

receiving an order for a transaction at a record collection site;
producing a record that represents the transaction ***at the record collection site;***

storing the record in a computer readable storage medium in a memory location ***at the record collection site;***

assigning a unique identifier to the record stored ***at the record collection site;***

entering the unique identifier in a hierarchical tree structure in a computer readable storage medium ***at the record collection site***, wherein the unique identifier comprises information for accessing the record in the memory location, and wherein the tree structure comprises a plurality of branches connected by nodes; and

sending the hierarchical tree structure to a central storage site that is separate from the record collection site to enable the central storage site to access the record corresponding to the unique identifier in the hierarchical tree structure.

24. A system comprising:

a record collection site that includes a computer system comprising ***logic instructions recorded on a computer readable storage medium*** which, when executed on computer system, cause the computer system ***to assign a unique identifier to a record stored at the record collection site and enter the unique identifier in a hierarchical tree structure;*** and

a central storage site remote from the record collection site, the central storage site ***includes*** a computer system comprising ***logic instructions recorded on a computer readable storage medium*** which, when executed on computer system, cause the computer system ***to receive the hierarchical tree structure from the record collection site and to selectively access the record being stored in the record collection site using the unique identifier.***

I. § 103 REJECTIONS

To summarize, each of independent claims 1, 17 and 21 recite several steps performed at a record collection site. These steps include receiving an order for a transaction, producing a related record, storing the record, assigning a unique identifier to the record, entering the unique identifier into a hierarchical tree structure, and sending the hierarchical tree structure to a separate central storage site. The central storage site uses the hierarchical tree structure to access the records stored by the record collection site as recited in claims 1, 17 and 21.

Appellant submits that there is no record collection site and separate central storage site in *Ang* or *Gibson* comparable to Appellant's claimed "record collection site" and "central storage cite." None of the entities in *Ang* or *Gibson* perform all of the steps performed at the claimed "record collection site" in claims 1, 17 and 21. *Ang*'s technique is summarized in the Abstract, which reads:

A system and method is provided for viewing hierarchical data on a portable computing device. The method and system provides for processing, organizing, and viewing hierarchically arranged data on a portable computing device display in a variety of embodiments. The system includes a central relational database for storing the source data, a data processing unit for converting the source data, and a text viewing software for multiple viewing platforms, including that of a personal digital assistant (PDA). The method disclosed provides for the processing of the source data, such as a medical text, into a relational database, and further processing of the database into platform-specific portable database files for viewing on a PDA. The data is arranged into a hierarchical data structure for dynamic viewing on a PDA display.

Ang thus teaches converting source data into a format suitable for the platform-specific requirements of a portable device. The obviousness rejection against claims 1, 17 and 21 is based on comparing *Ang*'s portable device and central relational database with Appellant's claimed "record collection site" and "central storage cite" respectively. However, the comparison fails. *Ang*'s portable device does not perform all of the record collection site steps recited in claims 1, 17 and 21. In particular, *Ang*'s portable device does not "receive an order for a transaction" nor "produce a record that represents the transaction." Furthermore, *Ang*'s mobile device does not send any hierarchical tree structure *Ang*'s central databases 105. Instead of sending a hierarchical tree structure to central databases 105, *Ang*'s mobile device receives a database formed by modifying source data from the central databases 105.

The discussion in *Ang* regarding rendering and viewing database information on a mobile device using a hierarchical format does not overcome the fundamental issue that the *Ang*'s mobile device does not send a hierarchical tree structure to the central databases 105. Because *Ang*'s mobile device does not

perform all of the recited record collection site limitations, the comparison of *Ang's* mobile device to Appellant's claimed "record collection site" fails.

Another fundamental issue is that *Ang's* central databases 105 do not access records stored on *Ang's* mobile device using a hierarchical tree structure sent from the mobile device to the central databases 105. There is no such use of a hierarchical tree structure in *Ang*. Instead, *Ang* teaches the central databases 105 simply provide the source data from which a database for the mobile device is formed. The hierarchical organization described in *Ang* is for rendering/viewing database information on the mobile device, not for enabling the central databases 105 to access stored transaction records on the mobile device. The Examiner's allegation that *Ang* teaches all the recited limitations of claims 1, 17 and 21 except for "receiving an order for a transaction at the record collection site" is therefore incorrect.

Gibson was cited as teaching the limitation "receiving an order for a transaction at the record collection site." However, *Gibson* does not overcome the deficiencies of *Ang* with respect to the fundamental issues of a "record collection site" sending a "hierarchical tree structure" to a central storage site and the central storage site using the hierarchical tree structure to access the records stored by the record collection site as in claims 1, 17 and 21. Due to the Examiner's improper reliance on (or interpretation of) *Ang*, the Examiner has failed to clearly and explicitly articulate the reason(s) why claims 1, 17 and 21 would have been obvious as is required to support a *prima facie* case of obviousness. Based on the foregoing, claims 1, 17 and 21, and their respective dependent claims are allowable over *Ang* and *Gibson*.

Independent claim 24 recites "record collection site" limitations and "central storage site" limitations directed to the fundamental issues discussed for claims 1, 17 and 21. For much the same reasons as given for claims 1, 17 and 21 with regard to these fundamental issues, claim 24 and its dependent claims are allowable over *Ang* and *Gibson*.

Independent claim 9 recites various record collection site limitations including "send[ing] an aggregate report of record type counts at the record

collection site based on the unique identifiers in the hierarchical tree structure, the aggregate report being sent to a central storage site that is separate from the record collection site.” There is no aggregate report sent from *Ang's* mobile device (compared to the claimed “record collection site”) to the central databases 105 (compared to the claimed “central storage site”) and thus the obviousness rejection of claim 9 fails. For at least these reasons, claim 9 and its dependent claims are allowable over *Ang* and *Gibson*.

II. CONCLUSIONS

For the reasons stated above as well as in Appellant's principle brief, Appellant respectfully submits that the Examiner erred in rejecting all pending claims. It is believed that no extensions of time or fees are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. § 1.136(a), and any fees required (including fees for net addition of claims) are hereby authorized to be charged to Hewlett-Packard Development Company's Deposit Account No. 08-2025.

Respectfully submitted,

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